

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

JANE DOE,

Plaintiff,

Federal Action No. 1:23-cv-23497-BB

v.

MIAMI GARDENS SQUARE ONE,
INC., *individually and d/b/a* TOOTSIE'S
CABARET MIAMI,

Defendant.

**MOTION TO APPEAR *PRO HAC VICE*,
CONSENT TO DESIGNATION, AND REQUEST TO
ELECTRONICALLY RECEIVE NOTICES OF ELECTRONIC FILING**

In accordance with Local Rules 4(b) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys of the United States District Court for the Southern District of Florida, the undersigned respectfully moves for the admission *pro hac vice* of Avery L. Larson of the law firm of Wallace & Allen, LLP, 440 Louisiana, Ste. 590, Houston, Texas 77002, (713) 227-1744, for purposes of appearance as co-counsel on behalf of Defendant Miami Gardens Square One, Inc., in the above-styled case only, and pursuant to Rule 2B of the CM/ECF Administrative Procedures, to permit Avery L. Larson to receive electronic filings in this case, and in support thereof states as follows:

1. Avery L. Larson is not admitted to practice in the Southern District of Florida and is a member in good standing of the Texas State Bar and the Southern District Court of Texas

2. Movant, Gary S. Edinger, Esquire, of the law firm of Benjamin, Aaronson, Edinger & Patanzo, P.A., 305 N.E. 1st Street, Gainesville, Florida 32601, (352) 338-4440, is a member in good standing of The Florida Bar and the United States District Court for the Southern District of Florida and is authorized to file through the Court's electronic filing system. Movant consents to be designated as a member of the Bar of this Court with whom the Court and opposing counsel may readily communicate regarding the conduct of the case, upon whom filings shall be served,

who shall be required to electronically file and serve all documents and things that may be filed and served electronically, and who shall be responsible for filing and serving documents in compliance with the CM/ECF Administrative Procedures. *See* Section 2B of the CM/ECF Administrative Procedures.

3. In accordance with the local rules of this Court, Avery L. Larson has made payment of this Court's \$200 admission fee. A certification in accordance with Rule 4(b) is attached hereto.

4. Avery L. Larson, by and through designated counsel and pursuant to Section 2B CM/ECF Administrative Procedures, hereby requests the Court to provide Notice of Electronic Filings to Avery L. Larson at email address: alarson@wallaceallen.com and service@wallaceallen.com.

WHEREFORE, Gary S. Edinger moves this Court to enter an Order for Avery L. Larson, to appear before this Court on behalf of Miami Gardens Square One, Inc., for all purposes relating to the proceedings in the above-styled matter and directing the Clerk to provide notice of electronic filings to Avery L. Larson.

Date: January 7, 2025.

Respectfully submitted,

/s/ Gary S. Edinger
Gary S. Edinger, Esquire
Florida Bar No. 0606812
BENJAMIN, AARONSON, EDINGER
& PATANZO, P.A.
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**ATTORNEY FOR DEFENDANT
MIAMI GARDENS SQUARE ONE, INC., D/B/A
TOOTSIE'S CABARET**

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CERTIFICATION OF AVERY L. LARSON

Avery L. Larson, Esquire, pursuant to Rule 4(b)(1) of the Rules Governing the Admission, Practice, Peer Review, and Discipline of Attorneys, hereby certifies that: (1) I have studied the Local Rules of the United States District Court for the Southern District of Florida; (2) I am a member in good standing of Texas State Bar and the Southern United States District Court of Texas; and (3) I have not filed more than three pro hac vice motions in different cases in this District within the last 365 days.

/s/ Avery L. Larson
Avery L. Larson